

December 16, 2014

VIA ECF

Hon. Katherine B. Forrest
U.S. District Court for the
Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007

Re: *In re Aluminum Warehousing Antitrust Litigation*, 13-md-2481, (KBF), *Direct Purchaser Class Plaintiffs*, No. 1:14-cv-3116
Agfa Corp. v. The Goldman Sachs Group, Inc., No. 1:14-cv-211
Mag Instrument, Inc. v. The Goldman Sachs Group, Inc., No. 1:14-cv-217
Eastman Kodak Company v. The Goldman Sachs Group, Inc., No. 1:14-cv-6849

Dear Judge Forrest:

Plaintiffs Agfa Corporation, Agfa Graphics, N.V., Mag Instrument, Inc., and Eastman Kodak Company (collectively, the “Individual Plaintiffs”) and the Direct Purchaser Class Plaintiffs (together with Individual Plaintiffs, “Plaintiffs”) write concerning briefing on their motions for leave to amend and Defendants’ motions to dismiss Kodak’s action. In light of the number and volume of briefs filed by Defendants, Plaintiffs respectfully request to be allowed to respond as follows:

- Individual Plaintiffs will file a single consolidated brief not to exceed 50 pages addressing all of Defendants’ antitrust standing, plausibility, and state law arguments.
- Individual Plaintiffs will file a single consolidated brief not to exceed 25 pages addressing the personal jurisdiction arguments raised by Defendants Glencore plc and Henry Bath and Son Ltd.
- Direct Purchaser Class Plaintiffs will file a single consolidated brief not to exceed 60 pages addressing all of Defendants’ antitrust standing, plausibility, state law, and personal jurisdiction arguments.

Plaintiffs submit that the filing of the above consolidated briefs will allow the Court to more efficiently consider Plaintiffs’ arguments.

Additionally, Plaintiffs respectfully request a short extension of time from Monday, December 29, 2014 to Friday, January 2, 2015, to file the above responses. Plaintiffs make this request so that they may fully prepare their responses.

Plaintiffs have conferred with Defendants, and Defendants do not oppose Plaintiffs’ requests.

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We thank the Court for its attention to these requests.

Very truly yours,

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JACOBSON LLP

SCOTT+SCOTT, ATTORNEYS AT LAW,
LLP

Christopher Lovell / w/ permission 2.2.14

Christopher Lovell
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Walter W. Noss

Walter W. Noss
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cc: Counsel of Record (via ECF)